

1 John A. Hunt, Esq. (NSBN 1888)  
2 Bert Wuester Jr., Esq. (NSBN 5556)  
3 **CLARK HILL, PLLC**  
4 3800 Howard Hughes Parkway, Suite 500  
5 Las Vegas, Nevada 89169  
6 ph. (702) 862-8300; fax (702) 862-8400  
7 email: jhunt@clarkhill.com  
8 email: [bwuester@clarkhill.com](mailto:bwuester@clarkhill.com)  
9 Attorneys for Defendant

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

VERONICA RAMIREZ, an individual,

Plaintiff,

vs.

STEPHEN A. GEPHARDT, M.D., LTD.,  
d/b/a "NEVADA PAIN CARE," a  
domestic corporation,

Defendant.

Case No: **2:20-cv-00882-RFB-EJY**

**JOINT NOTICE OF SETTLEMENT  
&  
ORDER VACATING EARLY NEUTRAL EVALUATION SESSION**

**WHEREAS**, Plaintiff, Veronica Ramirez ("Plaintiff"), and Defendant, Stephen A. Gephardt, M.D., LTD, d/b/a "Nevada Pain Care" ("Defendant" or "Nevada Pain Care"), by and through their respective counsel, hereby provide notice that the parties have arrived at a global settlement of this entire action (i.e., Veronica Ramirez vs. Stephen A. Gephardt, M.D., LTD., d/b/a "Nevada Pain Care", case no. 2:20-cv-00882-RFB-EJY).

**WHEREAS**, the parties have exchanged proposed settlement documents and anticipate submitting to this court a proposed stipulation and order for dismissal of the entire

1 action with prejudice within thirty (30) days.

2       **WHEREAS**, based on the above, the parties stipulate, agree, and request that the  
3 *Order* (document 10) filed July 30, 2020, which set an Early Neutral Evaluation (“ENE”)  
4 session for October 7, 2020, at 9:30 a.m. before Magistrate Judge Nancy J. Koppe and  
5 ordered that written evaluation statements be submitted by 3:00 p.m. on September 30,  
6 2020, shall be deemed withdrawn/vacated and the ENE taken off-calendar.  
7

8       Respectfully submitted:

9       **MULLINS & TRENCHAK, ATTORNEYS AT LAW**

10 By: Philip J. Trenchak       this 30<sup>th</sup> day of September, 2020.  
11 Philip J. Trenchak, Esq. (NSBN 9924)  
12 1614 South Maryland Parkway  
13 Las Vegas, Nevada 89104  
14 Ph. (702) 778-9444; fax (702) 778-9449  
15 Email: phil@mullinstrenchak.com  
16 Attorneys for Plaintiff

17       **CLARK HILL, PLLC**

18 By: John A. Hunt       this 30<sup>th</sup> day of September, 2020.  
19 John A. Hunt, Esq. (NSBN 1888)  
20 Bert Wuester, Jr., Esq. (NSBN 5556)  
21 3800 Howard Hughes Parkway, Suite 500  
22 Las Vegas, Nevada 89169  
23 Ph. (702) 862-8300; fax (702) 862-8400  
24 Email: [jhunt@clarkhill.com](mailto:jhunt@clarkhill.com)  
25 Email: [bwuester@clarkhill.com](mailto:bwuester@clarkhill.com)  
26 Attorneys for Defendant

27       **IT IS SO ORDERED:**

28       \_\_\_\_\_  
U.S. DISTRICT COURT JUDGE  
DATED: \_\_\_\_\_

260926655.1